

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:  
  
ALL CASES

**ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs move the Court to consider whether material designated confidential by Uber should be sealed.

Following the February 29, 2024 discovery hearing, the Court authorized the parties to file two-page letter briefs regarding whether a joint investigation by the San Francisco and Los Angeles District Attorneys fell within the purview of Pretrial Order No. 5. ECF No. 327. On March 11, 2024, Uber produced to Plaintiffs document requests from the DA inquiry. *See* ECF No. 337.

Plaintiffs' letter brief refers to a set of Demands for Production of Documents from the DAs' lawsuit which Uber designated "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY."

**Material To Be Filed Under Seal**

The material to be filed under seal is a portion of Plaintiffs' letter brief and an exhibit containing the Demands for Production of Documents. Thus, Plaintiffs request the Court consider whether the following should be filed under seal:

Document	Description	Designating Party
Plaintiffs' Letter Brief Re: San Francisco and Los Angeles DA Investigation	Portion of briefing referring to documents Defendants filed under seal	Uber
Exhibit B to Plaintiffs' Letter Brief	UBER-MDL3084-000053407- 53446 (First Set of Demands For Production of Documents to Uber Technologies, Inc., <i>People of the State of California v. Uber Technologies, Inc. et al.</i> Case No. CGC-14-543120 (S.F. Sup. Ct.)	Uber

Under Local Rule 79-5(f)(3), Uber bears the responsibility to establish that all of the designated material is sealable.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Sarah R. London in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: March 11, 2024

Respectfully submitted,

By: /s/ Sarah R. London

Sarah R. London (SBN 267093)

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